

United States
Department of the Interior
Bureau of Land Management

Miles City Field Office

SM Energy Company
Flaring

Determination of NEPA Adequacy
DOI-BLM-MT-C020-2013-0190-DNA

For Further Information Please Contact:

Bureau of Land Management
Miles City Field Office
111 Garryowen Road
Miles City, Montana 59301
406-233-2800

BLM



Worksheet
Documentation of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Miles City Field Office; Miles City, Montana

NEPA Number: DOI-BLM-MT-C020-2013-190-DNA

Case File/Project No:

Proposed Action Title/Type: SM Energy Co. Flaring of Non-Economic Gas

Location/Legal Description: Federal 12-28 – NWSW Sec. 28, T24N-R58E,
Mondak Federal 13-30 – SWSW Sec. 30, T23N-T60E,
and Mondak West Federal 14-32 – SESW Sec. 32, T23N-T60E

A: Description of the Proposed Action: Continued flaring of uneconomic casinghead gas

Applicant: SM Energy Company

County: Richland County

DNA Originator: Paul Helland

B. Land Use Plan (LUP) Conformance

LUP Name* Big Dry RMP Date Approved April, 1996

Other document** [EA MT-020-2012-196-EA \(1-22-21H APD\)](#) Date Approved 6-27-2012

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

☐ The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

☒ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) Big Dry RMP, Page 325, Under **Seperating, Treating, and Storage**, this section states in part, “the gas can be flared or vented into the atmosphere when authorized by permit in accordance with state and federal regulations.”

C. Identify applicable National Environmental Policy Act (NEPA) document(s) and other related documents that cover the proposed action.

Big Dry RMP, EA MT-020-2012-196-EA for the Dirk Federal 1-22-21H APD

D. NEPA Adequacy Criteria

- 1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?** This type of action is specifically discussed in the referenced RMP (the Big Dry RMP on page 325) and in the referenced EA. The volume of gas associated with these three wells is about 48 mcf/day with about 9 mcf/day used beneficially to operate production equipment. This request is to allow for continued flaring of the remaining approximate 39 mcf/day.
- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, resource values?** The proposed action is not new. The proposed action is a request to continue flaring casing head gas that is not needed to operate production equipment. The current circumstances and alternatives are similar to the situation analyzed in the RMP and referenced EA. The alternatives are to continue flare excess gas from each of these wells or no action (not approve the continued flaring of gas). If this gas is not flared, the wells cannot produce oil because it is not economical to install the infrastructure needed to market the volume of gas not used to operate production equipment.
- 3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstance would not substantially change the analysis of the new proposed action?** Yes, the existing analysis is valid given current circumstances and the information regarding this activity. Flaring this gas allows the wells to continue to produce oil and will not have a significant impact on air quality. This action would occur in the same Class II airshed as the existing analysis and circumstances are similar to the existing circumstances in the original analysis.
- 4. Are the direct, indirect and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?** Yes, the effects are similar to the situation analyzed in the RMP and the referenced EA.
- 5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Yes, other appropriate agencies are involved. When the operator has approval to vent or flare from the BLM, the Conditions of Approval state, "This approval does not constitute approval via permit or rule to vent gas from the Oil and Gas Conservation Division, Department of Natural Resource and Conservation of the State of Montana or the Air Quality Division, Montana Department of Health and Environmental Sciences. Venting and flaring cannot occur unless it is in compliance with the aforementioned

agencies' permits and administrative rules." Thus other agencies relevant to this action are involved as required.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Represented</u>	<u>Initials/Date</u>
Paul Helland	Petroleum Engineer	Minerals	PH 8-6-2013
David Breisch	Assistant Field Manager	Minerals	<i>DTB 8/8/13</i>



8/9/2013

Environmental Coordinator

Date

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

Please see attached COAs.

CONCLUSION

- ☒ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked



Todd Yeager
Field Manager
Miles City Field Office

8/9/2013

Date